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Proposed Attorneys for Chapter 11 Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re:

TRX HOLDCO, LLC, a Delaware limited
liability company,

Debtor and Debtor in Possession.

In re:

FITNESS ANYWHERE LLC, a Delaware
limited liability company, dba TRX and TRX
Training,

Debtor and Debtor in Possession.

☒ Affects both Debtors

☐ Affects TRX Holdco, LLC only

☐ Affects Fitness Anywhere, LLC only

Lead Case No.: 8:22-bk-10948-SC

Jointly administered with:
8:22-bk-10949-SC

Chapter 11 Cases

**NOTICE OF FINAL HEARING ON
DEBTORS' EMERGENCY MOTION
FOR ENTRY OF AN ORDER: (I)
AUTHORIZING THE DEBTORS TO
USE CASH COLLATERAL
PURSUANT TO 11 U.S.C. §§ 361, 361
AND 363; (II) GRANTING
ADEQUATE PROTECTION; AND
(III) GRANTING RELATED RELIEF**

DATE: June 30, 2022

TIME: 10:00 a.m.

PLACE: *Via ZoomGov

Courtroom 5C

411 West Fourth Street

Santa Ana, CA 92701

1 **PLEASE TAKE NOTICE** that the Court will hold a hearing on **June 30, 2022, at 10:00**
2 **a.m.** (the “Final Hearing”), to consider approval, on a final basis, of the *Debtors’ Emergency*
3 *Motion For Entry of An Interim Order: (I) Authorizing The Debtors To Use Cash Collateral*
4 *Pursuant To 11 U.S.C. §§ 361, 362 and 363; (II) Granting Adequate Protection; And (III)*
5 *Granting Related Relief* (the “Cash Collateral Motion”) (Doc 7), filed by TRX Holdco, LLC and
6 Fitness Anywhere LLC, dba TRX and TRX Training (together, the “Debtors”), the debtors and
7 debtors-in-possession in the above-captioned, jointly-administered, Chapter 11 bankruptcy cases.

8 **PLEASE TAKE FURTHER NOTICE** that the Final Hearing will be held virtually via
9 ZoomGov. Information to access and attend the virtual hearing via ZoomGov can be obtained
10 on the Bankruptcy Court’s website by viewing Judge Clarkson’s tentative ruling calendar for
11 June 30, 2022.

12 **PLEASE TAKE FURTHER NOTICE** that the Debtors will file any desired
13 supplement to the Cash Collateral Motion, including any proposed modifications to the Budgets,
14 by no later than June 15, 2022.

15 **PLEASE TAKE FURTHER NOTICE** that **any opposition to entry of an order**
16 **granting the Cash Collateral Motion on a final basis must be filed and served on proposed**
17 **counsel to the Debtors by no later than June 28, 2022.**

18 **PLEASE TAKE FURTHER NOTICE** that any reply to an opposition may be filed
19 with the Court at any time prior to the Final Hearing or asserted orally at the Final Hearing.

20 Dated: June 10, 2022

TRX HOLDCO, LLC
FITNESS ANYWHERE LLC

21
22 By: /s/ Krikor J. Meshefejian
23 RON BENDER
24 KRIKOR J. MESHEFEJIAN
25 LINDSEY L. SMITH
26 LEVENE, NEALE, BENDER,
27 YOO & GOLUBCHIK L.L.P.
28 Proposed Attorneys for Chapter 11 Debtors
and Debtors in Possession

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF FINAL HEARING ON DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER: (I) AUTHORIZING THE DEBTORS TO USE CASH COLLATERAL PURSUANT TO 11 U.S.C. §§ 361, 361 AND 363; (II) GRANTING ADEQUATE PROTECTION; AND (III) GRANTING RELATED RELIEF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 10, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Ron Bender rb@lnbyb.com
- Jonathan Gottlieb jdj@lnbyg.com
- Michael J Hauser michael.hauser@usdoj.gov
- Marsha A Houston mhouston@reedsmith.com, hvalencia@reedsmith.com
- Krikor J Meshefejian kjm@lnbyg.com
- Christopher O Rivas crivas@reedsmith.com, chris-rivas-8658@ecf.pacerpro.com
- Lindsey L Smith lls@lnbyg.com, lls@ecf.inforuptcy.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On (*date*) **June 10, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Scott C. Clarkson
U.S. Bankruptcy Court, Ronald Reagan Federal Building
411 West Fourth Street
Suite 5130
Santa Ana, CA 92701-4593

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **June 10, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 10, 2022
Date

Lourdes Cruz
Printed Name

/s/ Lourdes Cruz
Signature

In re TRX Holdco, LLC
File No. 9738
UST, 20 Largest, Secured

Michael J Hauser
United States Trustee
411 W Fourth St Suite 7160
Santa Ana, CA 92701-4593

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Madison, WI 53707-7398

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Sacramento, CA 95814

OTHER

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In re Fitness Anywhere LLC
File No. 9732
UST, 20 Largest and Secured

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Mason, OK 45040

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United States Trustee
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Vancouver, WA 98662

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Whippany, NJ 07981

Flexport Inc
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Dallas, TX 75320-7244

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Atlanta, GA 30328

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MAN Staffing, LLC
550 East Del Amo Boulevard
Carson, CA 90746

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Brooklyn, NY 11217

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Burlingame, CA 94010

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St. Louis, MO 63197-9000

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Bloomingdale, IL 60108

ISUPPORT WORLDWIDE LLC
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